

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,  Plaintiff-Applicant,  v.  BERNARD L. MADOFF INVESTMENT SECURITIES LLC,  Defendant.	SIPA LIQUIDATION  No. 08-01789 (SMB)  (Substantively Consolidated)
In re:  BERNARD L. MADOFF,  Debtor,	
IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff,  Plaintiff,  v.  STANLEY SHAPIRO, <i>et al.</i> ,  Defendant.	Adv. Pro. No. 10-05383 (SMB)

**[PROPOSED] STIPULATION AND ORDER  
ADJOURNING PRE-TRIAL CONFERENCE**

**WHEREAS**, on February 7, 2019, the Court entered a So-Ordered Amendment to the Case Management Plan that required plaintiff Irving H. Picard, as trustee (the “Trustee”) for the liquidation of Bernard L. Madoff Investment Securities LLC and the substantively consolidated estate of Bernard L. Madoff, and defendants in the above-captioned adversary proceeding to (i) submit a final pre-trial order by August 15, 2019, and (ii) set the final pre-trial conference for August 29, 2019 (ECF No. 132);

**WHEREAS**, on August 6, 2019, the parties notified the Court that they had reached a settlement in principle to resolve all the Trustee's claims against all defendants (ECF No. 136);

**WHEREAS**, on August 13, 2019, the Court entered a So-Ordered Stipulation to adjourn the final pre-trial order deadline *sine die* and to adjourn the final pre-trial conference to September 25, 2019 (ECF No. 138); and

**WHEREAS**, the parties have requested a further adjournment of the pre-trial conference to allow additional time to finalize a settlement agreement;

**NOW THEREFORE**, it is hereby stipulated and agreed by and between the parties, through their respective undersigned counsel, and **SO ORDERED** by the Court, that:

1. The final pre-trial conference is adjourned to October 30, 2019, at 10:00 a.m.

Dated: September 23, 2019  
New York, New York

/s/ Torello H. Calvani

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*and*

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*Attorneys for Trustee*

SO ORDERED this \_\_\_\_ day of \_\_\_\_, 2019.

\_\_\_\_\_  
HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE